

Exhibit “B”

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

EDWIN HERNANDEZ,
ARLES GRANADOS LAZO,
JOSE ORTEZ, YERLIN ORTEZ,
MARTIR SORTO, AND
SANTOS VELASQUEZ,

Plaintiffs,

v.

GOLDEN APPLE, INC., POMODORO
NORTH END, INC., MATT MURPHY'S
PUB, INC., SIOBHAN CAREW,
AND JONATHAN PELL,

Defendants.

Civil Action No. 1:13-cv-10394-WGY

**AFFIDAVIT OF COUNSEL IN SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL DEFENDANTS' INITIAL DISCLOSURES**

I, Michaela C. May, do depose based on my personal knowledge as follows:

1. I am an attorney duly licensed to practice law before this Court, and I am counsel of record for the Plaintiffs. I make the following statements based on my personal knowledge gained in that capacity and, if called to testify, could and would competently testify thereto.
2. This Declaration is made in support of Plaintiffs' Motion to Compel Defendants' Initial Disclosures.
3. On October 17, 2013, at Defendants' request, I agreed to an extension of the parties' deadline to file initial disclosures. With the seven-day extension, the deadline for initial disclosures changed from October 18, 2013 to October 25, 2013.
4. The following week, on October 22, 2013, Defendants' then-counsel informed me that they planned to file a motion to withdraw from the case.
5. Between October 22 and 24, 2013, I conferred repeatedly with Defendants' then-counsel regarding various lengthy extensions that Defendants sought in connection with their anticipated withdrawal as counsel.

6. During the course of these conversations, Defendants' then-counsel told me both that Defendants would not meet the October 25, 2013, deadline to file their initial disclosures and that his clients were unable to commit to any deadline in the near future by which they would do so.
7. Plaintiffs served their initial disclosures on October 25, 2013.
8. To date, Plaintiffs have not received Defendants' initial disclosures.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS 29th DAY OF OCTOBER 2013.

/s/ Michaela C. May

Michaela C. May, Esq.